IN THE UNITED STATES DISTRICT COURT FOR THE SOUTHERN DISTRICT OF OHIO WESTERN DIVISION

THE PROCTER & GAMBLE COMPANY,

and SUBSIDIARIES,

Civil Action No. C-1-02-150

(Senior Judge Herman J. Weber)

Plaintiff,

JOINT MOTION FOR EXTENSION OF

STAY

VS.

UNITED STATES OF AMERICA,

Defendant.

The parties hereto jointly move the Court for an extension of the present stay for a period of six (6) months for the reasons set forth in the accompanying memorandum.

Respectfully submitted,

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Assistant United States Attorney

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MEMORANDUM

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During the period since the last status report, the parties have conferred with each other, and have reached a tentative agreement to resolve all the issues in the case. The proposed agreement is currently in the final stages of review at the Department of Justice. After that review is complete, the agreement must be finally approved by the Assistant Attorney General. It is then subject to review by the Joint Committee on Internal Revenue of the Congress before it can be finally accepted by either side. We expect that approximately six (6) months will be required to complete these steps. Accordingly, the parties request that the Court stay this matter until March 1, 2005.

Respectfully submitted,

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